

U.S. DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FILED  
JAN 18 2018  
By DOUGLAS F. YOUNG, Clerk  
Deputy Clerk

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF ARKANSAS

DAVID A. STEBBINS

PLAINTIFF

VS.

CASE NO. 3:17-cv-03092

STATE OF ARKANSAS, ARKANSAS  
REHABILITATION SERVICES, AND AMY JONES

DEFENDANTS

**REPLY TO [136] RESPONSE IN OPPOSITION TO  
[123] MOTION FOR PARTIAL SUMMARY JUDGMENT**

Comes now, *pro se* Plaintiff David Stebbins, who hereby submits the following Reply to Doc. 136, Defendants' Response in Opposition to my Separate Motion for Partial Summary Judgment.

1. The Defendants are dead wrong when they say that this separate motion does not raise any new arguments. At first, I thought this was because they did not understand my arguments, as they clearly attacked a straw man my argument about the lack of essential nature of the eligibility requirement. However, they then proceeded to argue that they had produced evidence that my proposed accommodation is unreasonable, suggesting that they understood that argument.
2. In any event, I do maintain that my arguments are different than before. To the contrary, it is the Defense, not me, who argue the exact same arguments in their separate motion (Doc. 131).
3. The Defendants have not shown the existence of a genuine dispute of material fact in this case. Their baseless denials mean nothing, and the mere fact that the provided explanations (if indeed they did provide explanations) is not the same thing as providing evidence. Therefore, I am still entitled to judgment as a matter of law in the above-styled action.

Wherefore, premises considered, I respectfully request that the Defendants' Motions for Summary Judgment be denied, and that my Motions for Summary Judgment be granted.

So requested on this, the 17<sup>th</sup> day of January, 2018.

A handwritten signature in black ink, appearing to read "David Stebbins", written over a horizontal line.

David Stebbins  
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